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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of)	
themselves and all others similarly situated,)	
)	Case No. 6:21-cv-00474-AA
Plaintiffs,)	
v.)	DECLARATION OF PAUL
)	CARLOS SOUTHWICK
U.S. DEPARTMENT OF EDUCATION and)	
Suzanne GOLDBERG, in her official capacity as)	
Acting Assistant Secretary for Civil Rights,)	
U.S. Department of Education,)	
)	
Defendants.)	

I, Paul Carlos Southwick, declare:

1. I am over 18 years of age and have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.
2. Exhibit A is Email Correspondence with Seth Galanter (former Principal Deputy Assistant Secretary for Civil Rights in the Department of Education).
3. Exhibit B is Comment by Seth Galanter (former Principal Deputy Assistant Secretary for Civil Rights in the Department of Education) to Assistant Secretary Marcus RE: Proposed Rule 34 C.F.R. § 106.12(c).
4. Exhibit C is Twitter Posts (detailing stories of discrimination and LGBTQ+ student suicides at NFBCUs).

5. Exhibit D is *Christian College President Compares LGBT Students to Members of ISIS* (March 19, 2018); *LGBT BYU students fighting suicide while facing unique mental health challenges* (Nov. 11, 2016); *Students: BYU Honor Code leaves LGBT victims of sexual assault vulnerable and alone* (July 29, 2017).

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 17th day of August, 2021.

By: s/Paul Carlos Southwick

Paul Carlos Southwick